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October 25, 2022

**BY ECF**

The Honorable Katherine P. Failla  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2103  
New York, NY 10007

**MEMO ENDORSED**

Re: Maddy v. Hallmark Cards, Inc., 1:22-cv-05249

**Consent Letter Motion to Extend Defendant's Time to Respond to the Complaint**

Dear Judge Failla:

We represent Defendant Hallmark Cards, Inc. ("Defendant") in the above-captioned matter. We respectfully submit this letter to request an extension of Defendant's time to answer, move, or otherwise reply to the Complaint in accordance with the Court's Individual Practices. Mars Khaimov, counsel for Plaintiff Veronica Maddy, has consented to this request.

On September 22, 2022, Defendant filed a letter motion seeking an extension of the time to answer, move, or otherwise reply to the Complaint in this matter. *See* Dkt. 9. Per the Court's September 23, 2022 order granting Defendant's request for an extension, Defendant's deadline to respond to the Complaint is presently October 26, 2022. *See* Dkt. 10. Since that time, the Parties have been engaged in good faith discussions to resolve this dispute. In furtherance of their efforts, on October 24, 2022, Defendant requested a 30-day extension of time to respond to the Complaint until **November 25, 2022**. Mr. Khaimov consented to Defendant's request that same day.

Per the Court's September 23, 2022 order, the Initial Pretrial Conference was also rescheduled for November 9, 2022 at 12:00 pm. *See* Dkt. 10. In light of Defendant's request for an extension of the time to respond to the Complaint, Defendant further requests to adjourn the presently scheduled Initial Pretrial Conference.

This is the second request for an extension of this deadline in this case and second request to adjourn the Initial Pretrial Conference. The Parties will continue their discussions throughout this period, and agree that the requested extension will promote judicial efficiency and facilitate their good faith efforts to resolve this matter without further burdening this Court's time and resources. The Parties believe that there is a substantial prospect of a pre-answer resolution, and request this extension so that they can avoid unnecessary burdens on the parties and the Court.

Defendant therefore requests, and Plaintiff consents, that this Court grant Defendant an extension of thirty (30) days to respond to the Complaint to **November 25, 2022**.

Respectfully submitted,

/s/ Joseph M. Sanderson

Joseph M. Sanderson

cc: All counsel of record, via ECF

Application GRANTED. Defendant shall respond to Plaintiff's Complaint on or before **November 25, 2022**. In order to accommodate this extension, the initial pretrial conference scheduled for November 9, 2022, is hereby ADJOURNED to **December 22, 2022, at 11:00 a.m.** The Clerk of Court is directed to terminate the pending motion at docket number 11.

Dated: October 26, 2022  
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE